

Mine File
John Whitehead
ACT/007/016
Folder #2



United States Department of the Interior

FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
2060 ADMINISTRATION BUILDING
1745 WEST 1700 SOUTH
SALT LAKE CITY, UTAH 84104-5110

March 26, 1986

IN REPLY REFER TO:
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DIVISION OF
OIL, GAS & MINING

To: Administrator, Office of Surface Mining
Denver, Colorado
Attn: Vern Maldonado

From: **ACTING** Field Supervisor, Ecological Services
Fish and Wildlife Service, Salt Lake City, Utah

Subject: Gordon Creek #8 Mine Appended 12/10/85.

We have reviewed the amendments to the existing MRP addressing the #8 Mine, Beaver Coal Company. Following are our concerns.

-We have a question about the adequacy of predevelopment planning. There is a need for review of the entire development concept instead of examining one piece of the plan at a time. Regarding this, we have two comments:

wildlife issue?

- a) Does adequate drill hole data support creating the portal site or is it possible the area is so faulted that adequate data has not been collected to firmly show that the coal will be mineable.
- b) Can we presume the Hiawatha seam has the same faulting that prohibited mining the "A" seam from the #7 Mine. If so, will a further amendment be forthcoming for 3 more portals, etc., in 3-5 years.

-Some of the mitigation for wildlife for the #7 Mine included construction of artificial nest structures up-canyon. Although not utilized by birds yet, does this new proposal jeopardize their future use? The distance relationships should be analyzed and discussed.

-The proposed road and pad will likely impact aspen habitats. No site specific discussion of the affected wildlife or vegetation was provided. Only reclamation was proposed as mitigation for the surface disturbance.

-Cumulative impacts from many of the Company's activities at the #2/7/8 mines are yet unaddressed, except for reclamation. Wildlife use will be impacted for the life of the mines. We therefore, recommend that the Company erect and maintain 50 bluebird boxes for the life of the mines for prereclamation mitigation. These can be attached to powerpoles along the access road. The Service or UDWR could provide further guidance on this mitigation proposal if needed.

cc: UDOGM ✓
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Black & Schwarz